

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

NOV 14 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

TERRELL HARROLD, and
THOMAS PERRY,

Defendants.

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) No. S1-4:19-CR-00627 SNLJ/SPM
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SUPERSEDING INDICTMENT

COUNT I

[Sex Trafficking of Minor]

The Grand Jury charges that:

On or about July 20, 2019, within the Eastern District of Missouri, the defendants,

**TERRELL HARROLD,
and
THOMAS PERRY,**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means a person-namely, Victim 1-knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe Victim 1, that Victim 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c); and 2.

COUNT 2

**[Conspiracy to Commit
Sex Trafficking]**

The Grand Jury further charges that:

On or about July 20, 2019, within the Eastern District of Missouri, the defendants,

**TERRELL HARROLD,
and
THOMAS PERRY,**

did combine, conspire and agree with each other, to, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain, by any means a person-namely, Victim 1-knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Victim 1, that Victim 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1) and (c).

Manner and Means

1. HAROLD and PERRY did target and recruit "Victim 1" to engage in prostitution;
2. HAROLD and PERRY did recruit, entice, harbor, transport, provide, obtain, advertise and maintain "Victim 1" in a manner that affected interstate and foreign commerce for the purpose of engaging in prostitution;
3. HAROLD and PERRY would encourage, support, assist, counsel, aid and abet each other throughout the conspiracy.

Overt Acts in Furtherance of the Conspiracy

4. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following Overt Acts, among others, were committed in the Eastern District of Missouri and elsewhere:
 - a. On or about July 20, 2019, HAROLD and PERRY met Victim 1 in Saint Louis, Missouri outside a food and liquor convenience store, and eventually

persuaded, induced, enticed, or coerced her to travel with HAROLD and PERRY, where HAROLD and PERRY directed and arranged for Victim 1 to perform commercial sex acts;

- b. On or about July 20, 2019, HAROLD and PERRY persuaded, induced, enticed, or coerced Victim 1 to engage in acts of prostitution inside a Black GMC Yukon;
- c. On or about July 20, 2019, HAROLD and PERRY had control over Victim 1's physical movement, cell phone and manner of communication with others outside of the conspiracy;
- d. On or about July 20, 2019, HAROLD and PERRY directed and forced Victim 1 to participate in prostitution while under the influence of alcohol provided by HAROLD and PERRY;
- e. On or about July 20, 2019, HAROLD and PERRY solicited employees at a local Metro PCS store to engage and participate in commercial sex acts with Victim 1.

All in violation of Title 18, United States Code, Section 1594(c).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

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Assistant United States Attorney